

1 **NICOLAS V. VIETH**

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6 Attorney for Defendant - Jese David Carillo Casillas

7 **UNITED STATES DISTRICT COURT**
8 **FOR THE EASTERN DISTRICT OF WASHINGTON**
9 **(The Honorable Edward F. Shea)**

10 **UNITED STATES OF AMERICA,)**

Plaintiff,

11 **vs.**

12 **JESE DAVID CARILLO CASILLAS,)**

13 **Defendant.**

) CASE NO. 4:15-CR-06049-EFS-2

) SECOND MOTION

) TO CONTINUE THE

) DEADLINES FOR FILING

) PRETRIAL MOTIONS

) *Without Oral Argument*

) *Monday, June 18, 2018 at 6:30 p.m.*

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16 COMES NOW the Defendant, Jese David Carillo Casillas, by and through
17 counsel of record, Nicolas V. Vieth of Vieth Law Offices, Chtd., and moves the
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20 **SECOND MOTION TO CONTINUE THE**
DEADLINES FOR FILING PRETRIAL MOTIONS - 1

1 Court to extend the pretrial motions filing deadline currently set for Monday,
2 June 11, 2018, for a period of sixty (60) days.

3 The Defendant requests additional time based upon the following reasons:

- 4 1. The undersigned and defense investigator need additional time to
5 review the record and the voluminous amount of discovery, and to
6 meet with the client to discuss said discovery;
- 7 2. The defense's private investigator, William Long, is in the process
8 of conducting a drug quantity analysis based on all of the
9 information contained within the discovery materials;
- 10 3. Mr. Long estimates, with the utilization of discovery coordinator
11 Behind the Gavel's services, that he will require an additional thirty
12 (30) days to complete his review of discovery and prepare a
13 thorough investigative report. *See* ECF 751 (identifying potential
14 issues and possible pretrial motions).
- 15 3. Defendant further represents that Assistant United States Attorney,
16 Stephanie A. Van Marter, has been contacted and as of today's date
17 the Government's position regarding this request is unknown.

1 For all of the aforementioned reasons, Defendant respectfully requests a
2 continuance of sixty (60) days for all pretrial motion filing deadlines.

3 DATED this 11th day of June, 2018.

4 VIETH LAW OFFICES, CHTD.

5 /s/ Nicolas V. Vieth
6 NICOLAS V. VIETH
7 Attorney for Jese Carillo Casillas
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 11th day of June, 2018, the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system which sent a Notice of Electronic Filing to the following person(s):

USAWAE.CBaunsgardECF@usdoj.gov
USAWAE.SVanMarterECF@usdoj.gov

/s/ Nicolas V. Vieth
NICOLAS V. VIETH